

**From:** [HarborComments](#)  
**To:** [PortlandHarbor](#)  
**Subject:** Portland Harbor Superfund Comment  
**Date:** Monday, December 24, 2018 1:01:22 AM  
**Attachments:** [Portland Harbor Comment on Explanation of Significant Differences .pdf](#)

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**From:** (b) (6)  
**Sent:** Friday, December 21, 2018 1:06 PM  
**To:** HarborComments <HarborComments@epa.gov>  
**Subject:** Portland Harbor Superfund Comment

(b) (6)  
Portland, OR 97211

December 20, 2018

Environmental Protection Agency  
805 SW Broadway, Suite 500  
Portland, OR 97205

Re: Portland Harbor Superfund Comment on Explanation of Significant Differences

Dear EPA,

I am highly concerned about the the proposed changes to the Portland Harbor Superfund final cleanup plan that took more than sixteen years of work to create, and involvement and comments from tens of thousands of people who represent many more people affected by the water quality of this major river running through our city.

The U.S. Environmental Protection Agency (EPA) claims that scientific studies since the Obama years show benzo[a]pyrene is 7 times less toxic than was originally thought, though recent research from other sources may prove contrary to these claims and your research studies only account for cancer risk. Benzo[a]pyrene is a carcinogen that has been associated with a number of other health risks including cancer, heart disease, respiratory problems, and reproductive issues in addition to many more problems. Populations of people who depend on the river for sustenance fishing often do so out of need and are often at risk of health complications due to other drivers related to socio-economic pressures. We must clean up the river to the fullest extent possible.

There is no analysis of the toxicity of benzo[a]pyrene in combination with other chemicals at the site, including PAHs, PCBs, dioxins, organic chemicals, and metals. Scientists have demonstrated that even low-level exposures and combinations have powerful toxic effects, especially on developing animals across the animal kingdom. We know enough to determine that we need the strongest possible clean up plan.

The EPA has not yet determined whether this weakened cleanup would uphold water quality standards to protect people, animals, and the environment from dangerous

Risks. Weakening the cleanup would leave more contamination at the site for an indefinite amount of time; The U.S. EPA was already planning to cleanup only 13% of the worst contaminants. Our water is essential to all life and it is our responsibility to care for it. I ask that the EPA keep the original Record of Decision without change.

Sincerely,

(b) (6)